

DUST MANAGEMENT PLAN

PROJECT: COURTNEY DRIVE STAGE 4 & 5, UPPER COOMERA



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DMP SUB PLAN AUTHORISATION AND CONTROL

The Dust Management Plan (DMP) is authorised internally by the Project Manager or delegate and accepted by the Client.

REVISION

This document shall be reviewed at least six (6) monthly and approved by the Project Manager, with all updates communicated to all Workers. The Project Manager shall ensure the document remains controlled and up-to-date.

PROJECT DOCUMENT REVISION HISTORY

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GLOSSARY / ABBREVIATIONS

AQ	Air Quality
AS	Australian Standards
DMP	Dust Management Plan
CEMP	Construction Environmental Management Plan
ERSED	Erosion and sedimentation
ESCP	Erosion and Sediment Control Plan
EWMS	Environmental Work Method Statements
NEPC	National Environment Protection Council
NEPM	National Environment Protection Measures
Project, the	Courtney Drive, Upper Coomera, Stage 4 & 5

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1 INTRODUCTION

1.1 CONTEXT

This Dust Management Plan (DMP or the Plan) forms part of the Construction Environmental Management Plan (CEMP) for the Urban Development on Courtney Drive, Upper Coomera Stage 4 & 5 (the Project) to be constructed by Winslow.

This plan has been developed to comply with the Development Approval conditions and to provide strategies for dust control during activities on site to ensure dust levels are maintained to an acceptable level that meets legislative requirements.

1.2 SCOPE

This plan addresses the management of emissions to the atmosphere that may be caused by Project activities and that have the potential to adversely affect the environment or community by affecting air quality. It describes how Winslow proposes to manage and protect air quality and address requirements of Courtney Drive Stage 4 & 5 Estates Planning Approval Conditions and requirements and applicable legislation.

Activities conducted on the project that have the potential to impact air quality are provided below.

Table 1: Air Quality Hazards and Risks

Project Activity	Environmental Hazard	Environmental Risk
Vehicle movements	Generation of dust	Nuisance to community ¹
Vegetation clearing	Generation of dust and pollens	Nuisance to community ¹
Wind erosion of exposed areas	Generation of dust	Nuisance to community ¹
Stockpiling of material	Generation of dust	Nuisance to community ¹
Temporary access tracks	Generation of dust	Nuisance to community ¹
Bulk earthworks (cut and fill)	Generation of dust	Nuisance to community ¹
Air emissions, other than dust including exhaust fumes, odours/gases from construction activities	Generation of fumes and/or odours	Nuisance to community ¹

1. The generation of dust can have nuisance effects on the community which may include (but not limited to) aesthetic effects from visible airborne dust plumes, residences requiring additional cleaning, increased maintenance of air filters, potential health risks, impacts on water quality or vegetation health, residential living areas such as pools, air conditioning living etc.
2. Affecting flora with dust on leaves etc.

This plan does not address workplace respiratory dust which is covered through implementation of the Project's Health and Safety Management Plan.

During construction the following activities would potentially result in air quality impacts:

- vegetation clearing
- stripping and stockpiling topsoil
- windblown dust from exposed surfaces e.g. stockpiles, roads etc.
- earthworks

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- road construction
- transport and handling of soils and materials
- vehicular dust from traffic movements on unpaved roads
- use of construction vehicles, generating exhaust fumes.

2 LEGISLATION

The Australian Standard (ISO 14001:2015, 6.1.3) requires the Company to:

- a) determine and have access to the compliance obligations related to its environmental aspects.
- b) determine how these compliance obligations apply to the organisation.
- c) take these compliance obligations into account when establishing, implementing, maintaining and continually improving its environmental management system."

The constructing contractor understands the importance of meeting, and where practicable, exceeding, its regulatory obligations. All required compliance obligations are available electronically at site and displayed on the site noticeboard when required.

Winslow has developed a site-specific CEMP and relevant environmental procedure to comply with legislation outlined in the CEMP.

2.1 SPECIFIC CONDITIONS OF LOCAL, STATE AND COMMONWEALTH LEGISLATION

Conditions of local, state and Commonwealth laws, regulations and protection policies that apply specific criteria to emissions to the atmosphere relevant to the Project include:

Table 2: Air Quality Legislation

Legislation Title
<i>Environmental Protection Act 1994</i>
<i>Environmental Protection (Air) Policy 2019</i>

3 PROJECT TARGETS

The Project's risk management processes and the potential impacts to the community, the following air quality targets have been set for the Project. Any deviance from the targets will result in Project management immediately implementing corrective actions.

Table 3: Air Quality Project Targets

Key Performance Indicator	Target	Time Frame	Accountability
Number of non-compliant monitoring results	Zero	At all times	Project Manager
Number of actions taken by regulators and/or client	Zero	At all times	Project Manager

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4 CONTROLS USED TO MANAGE AIR QUALITY

Controls that are adequate to ensure compliance and reduce risk to as low as reasonably practical (ALARP) are implemented before any relevant work commences. Elimination of a hazard is the preferred method of control, followed by engineering and then administrative controls. Controls used on the Project include:

Table 4: Air Quality Controls

Control	Accountability
Minimising the areas in which vegetation has been removed or disturbed	Site Engineer/Supervisor
Progressively rehabilitating or grassing areas as soon as they become available	Project Engineer
During high winds (i.e. greater than 25 km/hr) a visual inspection of the site will take place and the dust situation will be assessed (i.e. dust risks to residents/road traffic). Possible controls are water cart or alter operating procedures.	Environment Manager / Superintendent
Applying dust suppressant (water) to areas that present a high risk for dust generation at a frequency sufficient to ensure contractual and compliance requirements are achieved and the community is not adversely affected	Site Engineer/ Supervisor
Establishing properly constructed rumble pads (as required) at all gates, for the ingress and egress of all vehicles	Project Engineer
Establishing traffic speeds in order to minimise dust generation and/or implement dust suppression measures in active construction areas	Superintendent
Assessing exhaust emissions as part of plant inspections, with excessive emissions resulting in the plant being removed from use	Plant Manager/Supervisor
Ensuring that burning-off does not occur on the Project	Superintendent
Plant and machinery will be switched off when not in use. Plant will be fitted with emission control devices complying with Australian Design Standards. Construction plant, vehicles and equipment will be maintained in good working condition to limit impacts on air quality	Supervisor
The use of alternative fuels and power sources for construction plant and equipment will be investigated and implemented, where appropriate.	Environment Manager

5 ENVIRONMENTAL ASPECTS AND IMPACTS

5.1 CONSTRUCTION ACTIVITIES

Emissions to the atmosphere during construction that could result in adverse impacts to air quality are typically divided into two categories:

- Dust and particulates.
- Gaseous.

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Key aspects of the Project that could result in dust emissions include:

- General earthworks particularly during site establishment.
- Vegetation clearing.
- Bulk earthworks.
- Drilling and blasting.
- Operating, crushing and screening.
- Topsoil / material handling including stockpiling, material loading and material haulage.
- Vehicular movements over unpaved surface (including unsealed access roads).
- Wind erosion of exposed areas and temporary stockpiles.
- Tracking of dirt onto roads.
- Liming operations.
- Mulching/chipping.
- Concrete cutting.

Air emissions, other than dust, which may be generated by construction activities include:

- Vehicle and plant exhaust emissions, which may be excessive if vehicles and plant are poorly maintained.
- Herbicide and pesticide spraying.
- Odours/gases released during:
 - Excavations of organic or contaminated materials
 - During sealing works
 - Waste storage.

5.2 FACTORS LIKELY TO AFFECT DUST GENERATION AND IMPACTS

In addition to the inherent risks of specific construction activities creating the potential to generate dust, a number of other environment factors also affect the likelihood of dust emissions. These include:

- Wind direction – determines whether dust and suspended particles are transported in the direction of the sensitive receivers.
- Wind speed – governs the potential suspension and drift resistance of particles.
- Soil type – more erodible soil types have an increased soil or dust erosion potential.
- Soil moisture – increased soil moisture reduces soil or dust erosion potential.
- Rainfall or dew – rainfall or heavy dew that wets the surface of the soil and reduces the risk of dust generation.
- Extent of vegetation cover – vegetation assists in stabilising soils and reduces the ability for dust erosion to occur.

5.3 IMPACTS

The potential for impacts on air quality will depend on a number of factors. Primarily impacts will be dependent on the nature, extent and magnitude of construction activities and their interaction with the natural environment. Potential impacts attributable to construction might include:

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- Deposition of dust on surfaces where it may cause damage and/or lead to a need for increased cleaning or repair.
- Aesthetic effects that arise from visible airborne dust plumes and from deposits of dust on surfaces.
- Need for increased maintenance of air filtering systems (eg air conditioners etc).
- Potential adverse health effects including eye, nose and throat irritation from excessive inhalation of fine particles.
- Impacts on water quality and/or vegetation health from dust deposition.
- Impacts on residential sensitive receivers, including impacts on living areas, swimming pools and general amenities.
- Complaints from the public relating to dust or odours.
- Dust deposition impacts on threatened flora species or habitat for threatened fauna species.
- Dust deposition impacts on sensitive agricultural receivers, including sugar cane and horticulture farms.
- Dust contamination of water tanks.

Section 5 provides a suite of mitigation measures that will be implemented to avoid or minimise dust impacts.

6 ENVIRONMENTAL CONTROL MEASURES

A range of environmental requirements and control measures will be identified in the various environmental documents, Assessments and Conditions of Approval. These specific measures and requirements to address impacts on air quality are incorporated into Table 5.

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Table 5 Air quality management and mitigation measures

ID	Measure / Requirement	Resources needed	When to implement	Responsibility	Reference
GENERAL					
AQ1	Training will be provided to all project personnel, including relevant sub-contractors on sound air quality control practices and the requirements from this plan through inductions, toolboxes and targeted training.		Pre-construction Construction	Environmental Site Representative	Good practice
AQ2	Air quality control measures from this plan will be included in relevant Environmental Work Method Statements (EWMS) and/or Erosion and Sediment Control Plans (ESCP).		Pre-construction / Construction	Environmental Site Representative	Good practice
AQ3	Vegetation clearing will be staged where possible to minimise the area and time that surfaces are exposed.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ4	Exposed surfaces with no scheduled work for two weeks will be treated to minimise dust generation. Exposed surfaces will be stabilised progressively using the most practical site specific methods, such as watering and geo-fabrics for short term exposure and emulsion spray, spray grass, soil compaction and revegetation for longer term exposed areas or final finishes.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ5	Construction activities will be modified, reduced or controlled during high or unfavourable wind conditions if they have a potential to increase off-site dust generation.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ6	Control measures including water carts, sprinklers, sprays, dust screens or the application of geo-binding agents will be utilised where applicable to control dust emissions. The frequency of use will be modified accommodate prevailing conditions. Dust		Construction	Supervisor Project Engineer Foreman Environmental Site Representative	Good practice

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ID	Measure / Requirement	Resources needed	When to implement	Responsibility	Reference
	control equipment will be maintained to ensure its operability.				
AQ7	Erosion control structures will be checked regularly for build-up of silt and other materials to ensure deposits do not become a dust source.		Construction	Supervisor Foreman Environmental Site Representative	Good practice
AQ8	Waste will be segregated and collected on a regular basis to ensure odours associated with waste do not become an issue.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ9	The application of pesticides and herbicides will be modified, reduced or controlled during high or unfavourable wind conditions where wind can carry pesticides outside of the defined treatment area.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ10	Stockpiles will be located in accordance with the ESCP. Control measures including water carts, sprinklers, sprays, dust screens or the application of geo-binding agents will be utilised where applicable to control dust emissions. A suitable cover crop or provision of other covering over topsoil stockpiles will be established where stockpiles are in place for longer than 4 weeks.		Construction	Supervisor Project Engineer Foreman Environmental Site Representative	Good practice
AQ11	If required shade cloths will be installed around low growing threatened species, in situ populations and threatened invertebrate habitat to provide dust protection and maintain microclimate.		Construction	Supervisor Project Engineer Foreman Environmental Site Representative	Good practice
AQ12	There will be no burning off of waste.		Construction	Foreman	Good practice
AQ13	Stormwater, recycled water or other water sources shall be used, where feasible and reasonable, in preference to potable water for construction activities, including concrete mixing and dust control.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ14	Disturbed areas will be progressively rehabilitated as soon as practical.		Construction/ Post-construction	Supervisor Project Engineer Foreman	Good practice

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ID	Measure / Requirement	Resources needed	When to implement	Responsibility	Reference
VEHICLE MOVEMENT AND MATERIAL STORAGE					
AQ15	Compounds, ancillary facilities, administration access roads and standing areas will be hard surfaced as soon as possible.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ16	Measures implemented to minimise dust, soil or mud from being deposited from vehicles on public roads. This will be achieved by implementing mitigation measures such as rumble grids and large aggregate at entry/exit points. In the event of any spillage or tracking, the spilt material will be removed within 24 hours. Management measures should include: • Watering of unsealed haul roads, as required • Visual checks of exhaust emissions. Vehicle movements on unsealed roads is to be minimised i.e. taking alternate routes, car-pooling, avoiding un-necessary trips. Unsealed roads will be avoided following rain events (where possible).		Construction	Supervisor Foreman Environmental Site Representative	Good practice
AQ17	Hardstand areas and surrounding public roads will be cleaned, as required, using methods including brooms, bobcat attachments or street sweepers.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ18	Vehicle movement will be confined to designated haul roads and areas. These roads will have speed limits of 40km/h in order to reduce dust generation. Reduced speed limit may be implemented where dust generation persists		Construction	Supervisor Project Engineer Foreman	Good practice
AQ19	All loaded haulage trucks will be covered where there is a risk of release of dust or other materials and at all times on public roads.		Construction	Foreman	Good practice

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ID	Measure / Requirement	Resources needed	When to implement	Responsibility	Reference
PLANT AND EQUIPMENT					
AQ20	Haul trucks and plant equipment will be switched off when not in operation for periods of more than 30 minutes. No Idling policy will be implemented (where possible)		Construction	Foreman Operators	Good practice
AQ21	Engines of plant parked next to residents will be switched off when not in operation. In the event that stationary equipment (i.e. generators, etc) is required, the location and orientation for this equipment must be considered in relation to any surrounding sensitive receptors.		Construction	Foreman Operators	Good practice
AQ22	Exhaust systems of construction plant, vehicles and machinery will be maintained in accordance with manufacturer's specifications to ensure that emissions do not exceed regulations. Periodic visual checks will be undertaken to ensure ongoing compliance, typically weekly.		Construction	Supervisor Project Engineer Foreman Operators	Good practice
AQ23	Any plant, equipment or machinery will be immediately switched off should there be visible signs of smoke emissions emitting from equipment/machinery.		Construction	Foreman Operators	Good practice
AQ26	Dust suppression systems will be installed and used on crushing and screening plants and mulching equipment to minimise generation of dust from these activities.		Construction	Supervisor Project Engineer Foreman	Good practice
INSPECTION, MONITORING AND RECORDS					
AQ27	Public roads will be inspected each day at main entry and exit points to and from areas where construction activities are taking place and compound. Material tracked onto the road pavement will be removed in accordance with AQ16.		Construction	Supervisor Project Engineer Foreman	Good practice
AQ28	Weather forecast will be reviewed on a daily basis and appropriate measures implemented where		Construction	Supervisor Project Engineer Foreman	Good practice
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ID	Measure / Requirement	Resources needed	When to implement	Responsibility	Reference
	unfavourable weather conditions (dry weather, wind speed>10m/s) are anticipated. Measures to be implemented during unfavourable weather conditions are outlined in AQ5 and AQ9.			Environmental Site Representative	
AQ29	Dust control and operational procedures will be reviewed and modified if results exceed the air quality criteria and are attributable to construction activities.		Construction	Supervisor Project Engineer Environmental Site Representative	Good practice
AQ30	Water captured in excavations will be used for construction or dust suppression.		Construction	Supervisor Project Engineer Foreman	Good practice

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7 COMPLIANCE MANAGEMENT

Winslow will manage the environmental performance and compliance of the Courtney Drive Urban Estate, Stage 2 by ensuring ongoing awareness training is delivered to project personnel and through independent inspections and audits. Winslow will be required to complete their own environmental inspections (including any sub-contractors works) and report outcomes, to provide evidence of the works compliance with legislative requirements, conditions of approval and standards and guidelines.

7.1 ROLES AND RESPONSIBILITIES

The organisational structure and overall roles and responsibilities for Winslow are outlined in the project CEMP. Specific responsibilities for the implementation of environmental controls are detailed in Section 5 of this Plan.

7.2 TRAINING

All employees, contractors and subcontractors working on site will undergo site induction training relating to air quality management issues. The induction training will address elements related to air quality management including:

- ☐ Existence and requirements of this sub-plan.
- ☐ Relevant legislation.
- ☐ DA conditions (e.g. specifically dust management competency and maintenance of plant and equipment conditions)
- ☐ Roles and responsibilities for air quality management.
- ☐ Air quality mitigation and management measures.
- ☐ Procedure to be implemented in the event of an incident (eg release of dust or gaseous emissions from site).

Targeted training in the form of toolbox talks and ongoing awareness training will also be provided to personnel with a key role in air quality management. Examples of training topics include:

- ☐ ERSED control installation methodology.
- ☐ Planning and preparedness for high wind events / dust risk periods.
- ☐ Lessons learnt from dusty periods, incidents and other event e.g. low rainfall/high wind.

Further details regarding staff induction and training are outlined in the project CEMP.

8 MONITORING

Air quality monitoring is performed that complies with legal and contractual requirements and which is sufficient to identify potential non-compliances before they occur. Where monitoring determines non-compliance to be a risk, work practices are altered and/or additional controls are implemented immediately.

Monitoring and analysis of data will be carried out by competent personnel. Training records will be maintained.

Visual impacts during construction would generally be associated with:

- ☐ Road embankment construction
- ☐ Plant and equipment along the alignment
- ☐ Vegetation removal
- ☐ Establishing the site compound and stockpile sites.

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Monitoring for the Courtney Drive Urban Estate, Stage 2 is to be conducted through:

- Daily visual monitoring for dust

8.1.1 METEOROLOGICAL MONITORING

The weekly weather will be distributed to the project team and the predicted wind speed will be accessed in the weekly weather reports. The project team will be advised if winds of greater than 25 km /hour are predicted, high dust generating operations may be rescheduled if required.

Adequate meteorological measurements are to be made to enable correct interpretation of monitoring data for the assessment of compliance and to identify potential non-compliances. The sources of these data are:

Table 6: Air Quality Meteorological Monitoring

Location	Air Quality Parameter	Equipment Type	Frequency
Bureau of Meteorology weather forecasts for Coomera 7 day forecast	Monitor for wind expected speeds greater than 25 km/hr	Bureau of Meteorology weather forecasts	Weekly

8.2 INSPECTION

Regular inspections will be undertaken during construction. Inspections will include, but not be limited to:

- Winslow supervisory inspections on a daily basis and environmental site representative weekly inspections.
- Observations to be recorded by the Winslow Site Supervisor will include:
 - Time, date and general direction of any event when significant dust is observed leaving the project area with the potential to impact nearby sensitive receivers (including residents and traffic) will be logged in the daily diary
 - Time, date and general direction of any external dust sources will be logged in the daily diary

Appropriate mitigation measures will be implemented to facilitate a proactive approach to the management of dust on site. These mitigation measures include water carts continuously providing dust suppression across the site.

8.2.1 INCIDENT RESPONSE AND CONTINGENCY MEASURES

Response to incidents will be undertaken as described Winslow CEMP.

If visual monitoring undertaken by Winslow indicates that mitigation measures are not fully effective or if dust complaints are received during the construction activities. Winslow will notify their client and halt works to implement additional measures to mitigate the dust issues. Winslow will determine if additional air / dust mitigation measures (e.g. additional water carts or site stabilisation such as soil binder or temporary cover crops) are needed and amend this DMP accordingly.

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8.3 AUDITING

Audits will be undertaken to assess the effectiveness of environmental controls, compliance with this plan and other relevant approvals, licenses and guidelines.

9 REVIEW AND IMPROVEMENT

9.1 CONTINUOUS IMPROVEMENT

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- ☐ Identify areas of opportunity for improvement of environmental management and performance.
- ☐ Determine the cause or causes of non-conformances and deficiencies.
- ☐ Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- ☐ Verify the effectiveness of the corrective and preventative actions.
- ☐ Document any changes in procedures resulting from process improvement.
- ☐ Make comparisons with objectives and targets.

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